

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
WINNIFRIED NOEL CHARLES,

Plaintiff,

NOTICE OF MOTION

- against -

07 CV 08324 (JSR)

MICHAEL CHERTOFF, Secretary of the  
Department of Homeland Security, in his official  
capacity, ENRICA TROY, MARY ANN GANTNER ,  
and the DEPARTMENT OF HOMELAND SECURITY,

Defendants.

-----X  
PLEASE TAKE NOTICE that, upon the Affidavit Michael P. Mangan, together  
with the exhibits thereto, and upon the accompanying Memorandum of Law in Support of  
the Motion for Leave to Amend the Complaint, Plaintiff Winnifried Noel Charles will move  
this Court before the Honorable Jed S. Rakoff, United States District Judge for the Southern  
District of New York, at the Courthouse of located at 500 Pearl Street, New York, New  
York, on a date convenient for the Court, for an order pursuant to Fed. R. Civ. P. 15(a), to  
grant Plaintiff leave to amend her Complaint.

Dated: New York, New York  
February 28, 2008

Respectfully submitted,

/s/

---

Michael P. Mangan (MM-5773)  
80 Wall Street, Suite 1214  
New York, New York 10005  
Phone: (212) 248-2171  
Fax: (212) 509-4522